

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

KENDALL SOVEREIGN,
a.k.a. "Kendall Kilinski," a.k.a. "Elizabeth Sovereign,"
a.k.a. "Kendall Staples,"

Case No. 1:22-MJ-86

CANDIE MARIE CALIX,
a.k.a. "Nicole Thomas," a.k.a. "Nikki Calix,"
a.k.a. "Candie Kendall," a.k.a. "Summer Angel,"

UNDER SEAL

and

JESSICA TALBOTT,

Defendants.

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Andrew B. Lenhart, Special Agent with the Federal Bureau of Investigation ("FBI"), Washington Field Office, being duly sworn, depose and state the following:

INTRODUCTION AND AGENT BACKGROUND

1. This affidavit is submitted in support of a criminal complaint charging Candie Marie CALIX, also known as "Nicole Thomas," "Nikki Calix," "Candie Kendall," and "Summer Angel"; Kendall SOVEREIGN, also known as "Kendall Kilinski" and "Elizabeth Sovereign" and "Kendall Staples; and Jessica Danielle TALBOTT, with knowingly, intentionally, and unlawfully conspiring with each other and with others, both known and unknown, to unlawfully, knowingly, and intentionally distribute controlled substances—to wit, oxycodone, a Schedule II controlled substance—in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

2. This affidavit is for the limited purpose of obtaining a criminal complaint. It is not intended to include every fact and matter observed by me or known to the government.

3. I have been a Special Agent with the FBI since 2003. I am currently assigned to the FBI's Washington Field Office, where I investigate white-collar crimes and drug offenses. As a Special Agent of the FBI, I am empowered by law to conduct investigations, make arrests, and execute and serve search and arrest warrants for offenses enumerated in Titles 18 and 21 of the United States Code, including offenses involving conspiracies to obtain and distribute pills containing oxycodone, methadone, and other drugs, including heroin, cocaine, and marijuana, in violation of 21 U.S.C. §§ 841(a)(1) and 846.

4. Title 21, Code of Federal Regulations, Section 1308.12(b)(1)(xiii) specifies that oxycodone is a Schedule II controlled substance. According to the Drug Enforcement Administration's scheduling parameters and under Title 21 United States Code, Section 812, Schedule II controlled substances have acceptable uses in treatment for medical issues in the United States, but they are subject to comprehensive restrictions and regulations because of the significant potential for abuse, which may lead to serious psychological and/or physical dependence. Through my training and experience, I have learned that oxycodone's effect on the abuser's brain and body is similar to heroin, a Schedule I drug.

5. Through my training and experience, I am familiar with oxycodone, which is the main ingredient in the drugs distributed by their trade names: Roxicodone, Percocet, and OxyContin. Oxycodone has become popular among pharmaceutical drug abusers. Addicts often crush oxycodone and snort the powder. Oxycodone pills typically have a time-release

mechanism, which delays the rate at which the oxycodone is absorbed into the body. Addicts defeat the time-release mechanism of oxycodone pills by eliminating the outer coating of the pills, thereby allowing the oxycodone to be absorbed into the body faster than intended by the manufacturer. In addition, drug addicts frequently exchange prescription narcotics, such as oxycodone, for other illicit narcotics, such as heroin, cocaine, or cocaine base. Pills containing oxycodone commonly sell on the street for approximately \$1 per milligram (“mg”) of oxycodone. These pills are manufactured in 5 mg, 10 mg, 15 mg, 30 mg, 40 mg, 60 mg, and 80-mg strengths. Most recently, oxycodone 30-mg pills, which are blue in color, have become the choice of addicts and their respective dealers because they are most easily abused due to their formulation. Oxycodone 30 mg pills are commonly referred to by street dealers as “thirties,” “blues,” “beans,” “blue dragons,” “blue dogs” blueberries,” “berries,” “blueberry muffins,” and “muffins.” They are also referred to by names that refer to the stamping on the pills provided by their respective manufacturers including: “Ms,” “Vs,” “As,” “15s,” “30s,” and “K9s.”

6. The facts and information contained in this affidavit are based upon my personal knowledge of the investigation and observations of other officers and agents involved in the investigation. All other observations were related to me or to law enforcement by the persons who made such observations. This is a joint investigation conducted by the FBI and other law enforcement agencies, including members of the Arlington County Police Department (ACPD) Warren County Sheriff’s Office (WCSO), Front Royal Police Department (FRPD), and the Virginia State Police’s Northwest Regional Drug Task Force (NWRDTF).

7. The evidence in support of the complaint includes incident reports from law enforcement agencies; physical surveillance by law enforcement; and statements provided to law enforcement agencies by the defendants, co-conspirators, and cooperators. During this investigation, the FBI and local law enforcement have used various investigative techniques, including confidential informants, physical and video surveillance, toll records, forensic extractions of cell phones, iCloud search warrants, and controlled purchases of contraband.

8. The evidence in support of the complaint also includes analysis of records from the Virginia Prescription Monitoring Program (“PMP”). In general, state prescription drug monitoring programs (“PDMPs”) consist of statewide electronic databases, which collect designated data on prescription controlled substances dispensed within the individual states. Virginia’s PMP collects prescription data from pharmacies for Schedule II through IV controlled substances. As such, the accuracy of the information depends on the correct input of the information by the pharmacies. In my experience, the information entered into the PMP is reliable, subject only to human error. Law enforcement utilizes the PMP solely as an investigative tool.

9. Based on the allegations set forth herein, I submit there is probable cause to believe that CALIX, SOVEREIGN, and TALBOTT along with others both known and unknown, unlawfully conspired to distribute, and did distribute controlled substances, in violation of 21 U.S.C. §§ 841(a)(1) and 846, within the Eastern District of Virginia and elsewhere.

PROBABLE CAUSE

10. CALIX nominally works as an office manager for a doctor in Arlington, Virginia (referred to herein as “Doctor-1”). Doctor-1’s medical practice is run out of Doctor-1’s home in Arlington, which is in the Eastern District of Virginia. Doctor-1’s home/medical practice is referred to herein as “the Residence.”

11. SOVEREIGN is CALIX’s mother. TALBOTT is one of CALIX’s close friends. CALIX and SOVEREIGN all reside on a family compound in Front Royal, Virginia (referred to herein as “the Property”), along with CALIX’s grandparents, C.T. and M.T., and CALIX’s husband, H.H. CALIX’s great-grandmother, H.M., also lives on the Property. Over the course of several years, Doctor-1 has regularly prescribed large quantities of oxycodone and other controlled substances to all of the individuals named in the criminal complaint, as well as C.T., M.T., H.H., H.M., J.S. (CALIX’s brother) and many other individuals known to the FBI, including several confidential sources used in this investigation.

12. The broader investigation that includes the facts supporting the charges against the individuals named in the criminal complaint began in and around 2005 and has involved numerous confidential sources and cooperating defendants. However, the only confidential sources directly relevant to the requested criminal complaint will be referred to herein as CS-3, CS-4, CS-6, CS-8, and CS-10, and will be referred to in the masculine regardless of true gender.

Virginia PMP Data

13. Law enforcement acquired records from the Virginia PMP for prescriptions issued by Doctor-1 for the time period of October 1, 2012, through March 4, 2022. These records

verified that Doctor-1 issued prescriptions for a significant amount of oxycodone 30-mg and oxycodone 15-mg pills to CALIX, SOVEREIGN, H.H., C.T., M.T., and TALBOTT, among many other people.

14. These records also verified that Doctor-1 issued prescription for large amounts of oxycodone to CS-6 and CS-10; as well as to other individuals linked to the conspiracy, including: J.S., T.H., J.B., L.B., S.S., T.S., and M.W.

15. As noted above, CALIX is nominally Doctor-1's "office manager" for Doctor-1's medical practice; however, PMP data shows that between October 1, 2012, and March 1, 2022 CALIX received a total of 39,768 oxycodone 30-mg pills, 9,296 oxycodone 15-mg pills, and 3,120 diazepam pills—an average of approximately 461 tablets per month. Based on my experience investigating pill diversion cases, I believe this is far in excess of normal therapeutic doses of oxycodone.

16. PMP data showed that Doctor-1 issued prescriptions for other controlled substances that are commonly abused and/or diverted to some of the same people listed above. These medications included alprazolam (Xanax), diazepam, lorazepam, clonazepam, carisoprodol (Soma), methadone, hydromorphone, and fentanyl. Doctor-1 also sometimes prescribed benzodiazepines (like alprazolam or diazepam) to patients on the same day or in close sequence to days in which s/he prescribed opioid medication. For example, on or about April 16, 2015, Doctor-1 wrote CALIX three prescription(s) for 168 oxycodone 15-mg pills, 90 diazepam 10 mg, and 60 methadone 10 mg pills. CALIX filled all three prescriptions on April 16, 2015. On or about May 27, 2019, Doctor-1 also wrote CALIX two prescription(s) for 200 oxycodone

15-mg pills and 60 diazepam 10 mg pills. CALIX filled both prescriptions on May 27, 2019. This is incredibly dangerous because of the increased risk of overdose associated with taking opioids and benzodiazepines.

17. PMP data further indicates that CALIX and SOVEREIGN submitted prescriptions issued by Doctor-1 under different names at the same time they were filling prescriptions from Doctor-1 under their true names. For example, PMP records show that CALIX used the name “Candie Kendall.” SOVEREIGN, CALIX’s mother, used the names “Kendall Kilinski” and “Elizabeth Sovereign.” Several of the prescriptions were funded by commercial insurance, Medicaid, and commercial insurances contracted by Medicaid.

18. Finally, PMP records showed that a significant quantity of the prescriptions issued by Doctor-1 were being filled at Bailey’s Pharmacy, an independent pharmacy in Falls Church, Virginia, which is in the Eastern District of Virginia. Cooperating sources have reported to law enforcement that the owner and sole pharmacist at Bailey’s (herein, “Pharmacist-1”) has an agreement to fill Doctor-1’s prescriptions. Between approximately February 2017 and March 2020, Pharmacist-1 was also prescribed approximately 960 alprazolam (Xanax) 2-mg pills by Doctor-1. Pharmacist-1 filled these at his own pharmacy.

Information from Cooperating Sources

A. CS-3

19. CS-3 was interviewed by law enforcement approximately seven times between November 2017 and February 2018, and again in February and March 2022. Law enforcement used several means to corroborate the information provided by CS-3, including witnesses,

recordings of jail conversations, video surveillance, physical surveillance, and documents. CS-3 has no pending charges in the Eastern District of Virginia and was not seeking any consideration from law enforcement. In sum and substance, the information provided by CS-3 is related below.

20. CS-3 is familiar with the narcotics distribution network involving CALIX, SOVEREIGN, TALBOTT, H.H., and others. CS-3 became involved in and around January 2017. CS-3 stated that the co-conspirators referred to Doctor-1 as “the doctor”; Doctor-1’s first or last names were rarely if ever used. CS-3 advised that when speaking or texting about drug transactions, in order to be covert about her illegal activities, CALIX referred to oxycodone 30-mg pills as “blueberries” or “berries.” CALIX referred to oxycodone 15-mg pills as “beans,” and she referred to methadone 10-mg pills as “donuts.” Based on my training and experience, I know it is common for drug dealers to refer to illicit narcotics by slang terms.

21. CS-3 is also familiar with the Property in Front Royal, and lived on the Property for a period of time from approximately late 2016 to spring 2017. CS-3 also heard CALIX and J.S., CALIX’s brother, refer to it as “the property.” The Property belongs to C.T. and M.T., CALIX’s grandparents. Doctor-1 writes prescriptions for oxycodone pills and methadone pills to CALIX, SOVEREIGN, M.T., C.T., H.H., H.M., and others. CALIX pays cash at the pharmacy to fill the prescriptions. CALIX keeps all or most of the pills prescribed to her and her family members and sells them for profit. C.T. and M.T. do not take any of the pills, and they are fully aware that CALIX is selling their pills for money. CALIX supports them and her own

lifestyle with the proceeds from the sale of the pills. CALIX uses some of the proceeds from the sales to pay the bills for the Property and to support M.T. and C.T.

22. During approximately 2017 and 2018, CALIX gave CS-3 ten 10-mg methadone pills per week. CALIX also gave some of them to CS-3 in exchange for work CS-3 provided to CALIX at a residence in Alexandria, and some of them as a favor to CALIX's brother, J.S. CALIX was aware that CS-3 was addicted to opiates and abused them. Sometimes CALIX provided oxycodone 30-mg to CS-3 for CS-3 to use illicitly to get high. CALIX told CS-3 that CALIX consumed oxycodone 30-mg pills. CS-3 witnessed CALIX exchange pills for money with other people between 50 and 100 times. CS-3 recalled a specific time CALIX gave CS-3 a "gift" of approximately 20 oxycodone 30-mg pills and \$400-\$500 cash.

23. CS-3 advised that J.S., CALIX's brother, received oxycodone prescriptions from Doctor-1, but the pills were controlled and distributed to him by CALIX. J.S. took four oxycodone 30-mg pills per day at a minimum.

24. CS-3 also advised that SOVEREIGN is CALIX's and J.S.'s mother. SOVEREIGN also sells oxycodone pills. CS-3 witnessed J.S. purchase between two and ten oxycodone 30-mg pills directly from SOVEREIGN approximately five times. CS-3 saw SOVEREIGN distribute oxycodone pills approximately 50 times.

25. CS-3 knew CALIX to carry hundreds of dollars in cash and dozens of oxycodone and methadone pills with her everywhere she goes. CALIX also spent a lot of the money on traveling for herself and her husband, H.H., and they stay at extravagant hotels when they travel.

In and around June 2017, CS-3 witnessed CALIX spend \$800 in cash at a bridal store without hesitation.

B. CS-4

26. CS-4 was interviewed by law enforcement approximately four times between March 2019 and February 2022. Law enforcement used several means to corroborate the information provided by CS-4, including confidential informants, recordings of jail conversations, video surveillance, physical surveillance, and documents. CS-4 has no pending charges in any jurisdiction and is not seeking any consideration from law enforcement. In sum and substance, the information provided by CS-4 is related below.

27. CS-4 has known CALIX's brother, J.S., since childhood. CS-4 knew CALIX by several aliases, including "Nikki," "Nicole," "Angel," "Summer," and "Summer Angel." CS-4 did not know CALIX's true first name but advised that he thought it was "Candie."

28. In and around July 2018, CS-4 visited the Property in Front Royal, as well as a mobile home in Winchester, Virginia, where CALIX was staying sporadically. CS-4 described the Property as a several-acre parcel of land with two dwellings on it. C.T., M.T., and SOVEREIGN live in the "main house." There is a second, one-bedroom house where CALIX and H.H. reside with their children approximately three to four days per week. Other days of the week, they live in other locations such as hotels and trailer parks.

29. In the summer of 2018, J.S. told CS-4 about CALIX's and the rest of the family's involvement in the conspiracy with Doctor-1 to receive illegitimate prescriptions for oxycodone pills and to sell the pills for profit to drug users in Front Royal and elsewhere. CS-4 understood

that CALIX had been an office manager or employee of Doctor-1 for several years and uses her position as office manager to get appointments for family members and friends so they can get prescriptions for oxycodone pills and other narcotics. CS-4 described CALIX as “slick” and “smart,” and someone who uses others to distribute pills at her direction.

30. At some point, CS-4 told J.S. that CS-4 had a medical diagnosis of spinal stenosis. J.S. became very excited and told CS-4, “We can make millions. I’m going to call [CALIX] now.” J.S. was told by CALIX that the doctor was full at the time; however, CS-4 was not interested in participating in the conspiracy anyway.

31. CS-4 was at the Property in or around July 2018. CS-4 overheard M.T. get angry with J.S. when M.T. found out that J.S. told CS-4 about the conspiracy. CS-4 heard M.T. yell, “Don’t you tell her that!!!” from another room. M.T. eventually came to CS-4 and said, “if it’s true what [J.S.] told you and we were making all this money, do you think we would live like this?”

32. In July 2018, CS-4 went to see CALIX in a mobile home in a trailer park in Winchester, where CALIX sometimes stayed. TALBOTT, CALIX’s best friend, was also staying there. CALIX was driving a large minivan at the time. CALIX had a safe in a bedroom of the trailer, where she kept thousands of dollars in cash in hundred-dollar bills. CS-4 saw CALIX go in the bedroom to retrieve cash. CS-4 saw CALIX spend \$2400 in cash on two iPhones for CS-4 and CS-4’s child, and an additional \$1000 cash at a women’s apparel store.

33. CALIX also stored pain pills at the mobile home. CS-4 explained that CALIX claims that she has lupus, an autoimmune disease, and consumes pain pills in combination with

Red Bull, a stimulant beverage. CS-4 complained about being in pain while she was at the trailer with CALIX and CALIX handed CS-4 three or four pills and told CS-4 to take them. CS-4 does not use opiates and is not familiar with pain pills, so CS-4 did not know what kind of pills they were. However, CS-4 swallowed the pills and they “knocked [CS-4] out.”

34. CS-4 stated that H.H., CALIX’s husband, does not have an apparent medical condition that would necessitate pain medication and does not appear to be in pain. CS-4 has witnessed H.H. perform manual labor on the Property without difficulty. According to CS-4, neither M.T., C.T., nor SOVEREIGN have an apparent or observable medical condition that would warrant pain medication.

35. CS-4 knew that in approximately 2018, SOVEREIGN was charged with drug distribution in Warren County, Virginia, for selling opioids obtained from Doctor-1; however, CS-4 knew that SOVEREIGN did not serve any time in jail. Publicly available records show that in December 2018, SOVEREIGN pleaded guilty to distributing oxycodone in Warren County. She was sentenced to five years imprisonment, all of which was suspended.

C. CS-6

36. CS-6 was interviewed by law enforcement in December 2018, August 2020 and again in April 2021. Law enforcement used several means to corroborate the information provided by CS-6, including other confidential informants, recordings of jail conversations, video surveillance, physical surveillance, and documents. CS-6 has no pending charges in the Eastern District of Virginia. CS-6 is currently serving prison time for a serious drug offense and

is seeking potential consideration. In sum and substance, the information provided by CS-6 is related below.

37. For several years, CS-6 purchased oxycodone pills from CALIX, TALBOTT, SOVEREIGN, and other co-conspirators. CS-6 was familiar with the relationship between CALIX and Doctor-1 and stated that the drug distribution partnership had been going on for approximately ten years.

38. CS-6 stated that CALIX receives prescriptions for oxycodone written by Doctor-1 on behalf of herself and her family members and friends. CS-6 has never been a patient of Doctor-1 but has visited the Residence in Arlington and spoken to Doctor-1.

39. By virtue of CS-6's work in landscaping, CS-6 frequently had cash on hand. CALIX and others, including J.S., would use CS-6's cash to pay for appointments with Doctor-1 and for the prescriptions Doctor-1 issued to them for oxycodone and methadone. CS-6 resided in Front Royal, and frequently drove CALIX, J.S., and others to their appointments with Doctor-1 in Arlington. CS-6 would wait outside the Residence until the visit was over, and then drive them to Bailey's Pharmacy in Falls Church to fill the prescriptions. CS-6 paid Pharmacist-1 for the cost of the prescriptions as part of his payment to CALIX for some of the pills.

40. CALIX accompanied CS-6 (and the "patient") to the pharmacy. After the transaction at the pharmacy, CALIX confiscated the oxycodone and methadone pills to sell for a profit. CS-6 bought oxycodone from CALIX at an approximate cost of \$15 per 30-mg pill, if the pills were procured in Arlington or Falls Church. For oxycodone pills in Front Royal, CALIX

charged CS-6 \$25 per 30-mg pill. CS-6 usually purchased \$900 worth of pills. This happened once per month, every month, for at least six years.

41. CS-6 described CALIX as the “gate-keeper” for patients from Front Royal gaining access to prescriptions for oxycodone, methadone, and other narcotics from Doctor-1. CS-6 explained the means through which CALIX controls the distribution of prescription pills from Doctor-1 as follows:

- a. CALIX schedules all appointments with Doctor-1. Every appointment is for the purpose of obtaining pain medication. At CALIX’s direction, Doctor-1 prescribes each “patient” 160 oxycodone 15-mg pills and 240 oxycodone 30-mg pills per office visit.
- b. Typically, the patients that CALIX “brokers” get to keep the prescription for the oxycodone 15-mg pills, but CALIX confiscates the oxycodone 30-mg pills and sells them for a personal profit. Some of the patients that CALIX “brokers” are TALBOTT, M.T. and C.T. (CALIX’s grandparents), H.M., L.B., J.B., M.W., S.S., and T.H. (CS-2’s son), who died of a drug overdose. With assistance from CALIX, J.B. was prescribed oxycodone prescriptions from Doctor-1 while he was incarcerated.
- c. CALIX also uses others to sell oxycodone pills on her behalf. For several years, CS-6 regularly sold pills at CALIX’s direction. CALIX also uses SOVEREIGN (CALIX’s mother), H.H. (CALIX’s husband) and TALBOTT (CALIX’s best friend) to sell pills.

42. When CS-6 was selling oxycodone on CALIX's behalf, CS-6 sold between 30 and 40 oxycodone 30-mg pills approximately three times per week, every week, for at least five years. CALIX paid CS-6 for distributing her pills by letting CS-6 keep ten oxycodone 30-mg pills.

43. Many of the drug transactions between CALIX and CS-6 took place at the Property. Some of the transactions took place at the Walmart at Riverton Commons in Front Royal. CS-6 also purchased pills from H.H. at least 25 separate times. Many of these transactions took place at the Property. CS-6 purchased between 20 and 40 oxycodone 30-mg pills from H.H. each time.

44. When CS-6 bought pills from SOVEREIGN, CS-6 paid SOVEREIGN between \$300 and \$500 for the pills. Some of these transactions took place at the Starbucks at Riverton Commons in Front Royal, where SOVEREIGN frequently hangs out.

45. When CS-6 bought pills from TALBOTT, CS-6 paid TALBOTT \$30 per pill. On approximately five different occasions, CS-6 bought between 10 and 20 oxycodone 30-mg pills from TALBOTT.

46. In August 2017, CS-6 met CALIX and SOVEREIGN at the Holiday Inn in Winchester and purchased 30 oxycodone 30-mg pills from them. CS-6 remembered that CALIX and SOVEREIGN were in Winchester to reserve a hotel room for J.S. who was hiding from law enforcement because J.S. had escaped from his work release at RSW Regional Jail.

D. CS-8

47. Another confidential source (“CS-8”) was interviewed by law enforcement in February 2020. Law enforcement used several means to corroborate the information provided by CS-8, including confidential informants, recordings of jail conversations, video surveillance, physical surveillance, smart phone extraction data, and documents. CS-8 has no pending charges in the Eastern District of Virginia. At the time of the interview, CS-8 was serving a Virginia state jail sentence for felony possession of Schedule I and Schedule II substances. In sum and substance, the information provided by CS-8 is related below.

48. CS-8, who suffers from opioid addiction, met TALBOTT in November 2017 when they were co-workers at a McDonald’s restaurant in Front Royal. Approximately one month later, CS-8 found out that TALBOTT also abused opioids and they began getting high together. TALBOTT did not have a car nor a valid driver’s license, so CS-8 became her driver.

49. In approximately January 2018, CS-8 drove TALBOTT to the Property to obtain oxycodone pills from CALIX for personal use and to sell for profit. CS-8 described CALIX’s home on the Property as a small blue building behind a larger white home. TALBOTT exited CS-8’s vehicle and entered the small blue building while CS-8 remained in the car. When TALBOTT exited the blue building and returned to CS-8’s car, TALBOTT had approximately 20 oxycodone 30-mg and 15-mg pills that she told CS-8 she obtained from CALIX. TALBOTT and CS-8 sold the oxycodone 30-mg pills for \$30 per pill. They sold 15-mg oxycodone pills for \$15 per pill.

50. From then on, between approximately January 2018 until late December 2018, CS-8 and TALBOTT obtained oxycodone 30-mg and 15-mg pills from CALIX between three and seven days per week. Each transaction involved between five and 30 pills. TALBOTT had drug customers throughout the area that purchased the pills. Because CS-8 was not from the area, she did not know them and could not currently recall their names. After TALBOTT sold the pills, she returned half the proceeds from the sale of the pills to CALIX and picked up more pills to sell.

51. In approximately June 2018, CALIX became comfortable meeting directly with CS-8. At least ten different times, beginning in June 2018, CALIX exited her residence on the Property and came out to the driveway to meet them in the car to hand the pills directly to TALBOTT in front of CS-8. CALIX provided the pills to TALBOTT in an orange prescription bottle or plastic baggies. Sometimes the transactions between TALBOTT and CALIX were hand-to-hand exchanges without a container for the pills.

52. In approximately September 2018, CALIX and her husband, H.H., were staying in a trailer located in a mobile home park in Winchester in addition to the small residence on the Property. CS-8 went inside the trailer but was not allowed in the room where CALIX kept the money and the pills. H.H. was fully aware of “the operation” to distribute oxycodone pills for profit. H.H. was observed by CS-8 at the Property and the trailer park at various times when CALIX provided pills to TALBOTT. H.H. drove a maroon Honda sedan. CS-8 stated that CALIX and H.H. make a lot of money selling pills and support their lifestyle with the sale of the pills because neither of them have legitimate employment.

53. TALBOTT told CS-8 that the source of the oxycodone pills, as well as some methadone pills that were also distributed as part of the conspiracy, were prescriptions issued to CALIX, TALBOTT, and CALIX's family members by Doctor-1.

54. CS-8 knew that CALIX did not have a normal doctor-patient relationship with Doctor-1. CALIX cleaned Doctor-1's house and performed clerical duties as an office worker a few days per month. CALIX arranged for all her family members who lived at the Property to receive prescriptions for oxycodone and/or methadone from Doctor-1. These people included SOVEREIGN, H.H., J.S., and others. Neither CALIX, H.H., SOVEREIGN, nor TALBOTT have legitimate medical issues that would require narcotic pain medication. TALBOTT told CS-8 she made up a health problem so she could get prescriptions for oxycodone.

55. SOVEREIGN provided or "fronted" pills to TALBOTT and CS-8 more than forty times during a six-month period from June 2018 until December 2018. Most of the transactions involved between three and five oxycodone 30-mg pills. On at least ten different occasions, the transactions involved at least 20 oxycodone 30-mg pills. Some of the transactions occurred at Bing Crosby Baseball Park in Front Royal. Every time pills were sold, cash profits were returned to CALIX. In approximately the summer of 2018, SOVEREIGN met CS-8 and TALBOTT in the parking lot of a 7-11 in Front Royal. SOVEREIGN drove a white Jeep.

56. In or around October 2018, CALIX's brother, J.S. was living in a hotel in Winchester after returning to Virginia from Florida. J.S. was attending a methadone clinic because of his addiction to opiates. J.S. did not have a car or a driver's license, so CS-8 drove him to the clinic every day. CALIX paid CS-8 with oxycodone pills in exchange for driving J.S.

CALIX also directed TALBOTT and CS-8 to deliver oxycodone pills to J.S. They delivered pills to him at least once per week, while J.S. was in the methadone clinic. CALIX spoke in code when referencing oxycodone pills. She referred to oxycodone 30-mg pills as “blueberries” and oxycodone 15-mg pills as “beans” or “green beans.”

Information from Jessica TALBOTT

57. In and around December 2021, TALBOTT was arrested on state charges in Warren County, Virginia. TALBOTT was seeking consideration from law enforcement for her pending charges and agreed to be interviewed by law enforcement approximately three times. TALBOTT had previously been interviewed in and around June 2016. The information provided by TALBOTT was corroborated by confidential informants, recordings of jail conversations, video and physical surveillance, and documents. In sum and substance, the information provided by TALBOTT is related below.

58. TALBOTT stated that she met CALIX in approximately 2013 through an individual (A.J.) who was buying oxycodone pills from CALIX. During this timeframe, TALBOTT personally witnessed CALIX sell pills to A.J. TALBOTT learned that CALIX was an employee of Doctor-1 and completed paperwork, scheduling, and insurance billing for Doctor-1. TALBOTT reported that CALIX is still an employee of Doctor-1 and performs the same functions. TALBOTT acknowledged that CALIX has used several different names over the years and frequently refers to herself as “Nikki.”

59. TALBOTT reported that CALIX and her family members have been involved in a conspiracy to distribute thousands of oxycodone pills for profit for several years, since at least

2013. CALIX held and controlled the money and the pills involved in the conspiracy. CALIX also directed SOVEREIGN and TALBOTT to sell the pills involved in the conspiracy. CALIX used her relationship with Doctor-1 to arrange medical appointments for herself, her family members, and friends in Front Royal, Virginia. CALIX arranged for the following persons to get prescriptions from Doctor-1: SOVEREIGN, M.T., C.T., H.H., J.S., H.M., L.B., J.B., S.B., T.S., and TALBOTT.

60. TALBOTT reported that all these people kick back some or all of their pills to CALIX for her to sell for profit. C.T., M.T., and H.H. do not use any of the pills that Doctor-1 prescribes them and are fully aware their pills are being sold for profit at CALIX's direction. The money from the drug sales is used to pay the mortgage, bills, as well as renovations and additions to the Property, where CALIX, H.H., their four children, SOVEREIGN, M.T., and C.T. all reside. None of them have legitimate employment.

61. Beginning in and around mid-2013, CALIX arranged for TALBOTT to become a patient of Doctor-1. Over a period of approximately eight years, TALBOTT was prescribed as many as 210 oxycodone 30-mg pills and 210 oxycodone 15-mg pills every month by Doctor-1. This is corroborated by PMP records. According to her arrangement with CALIX, TALBOTT kept the oxycodone 15-mg pills each month for herself but distributed the entire prescription of oxycodone 30-mg pills to CALIX every month, for CALIX to redistribute. This continued until approximately September 2020.

62. During this period, TALBOTT also sold oxycodone pills on CALIX's behalf. TALBOTT obtained the pills from CALIX at the Property from either of the two houses located

on the Property where CALIX kept the pills in a safe. CALIX usually “fronted” the oxycodone pills to TALBOTT, who then sold the pills and returned the cash from the sales back to CALIX. CALIX usually paid TALBOTT in pills for selling the drugs. CALIX also left the oxycodone pills for TALBOTT to sell in the women’s bathrooms of the Starbucks and Wal Mart in Front Royal in hidden locations to avoid being seen distributing the pills. TALBOTT also purchased oxycodone 30-mg pills directly from CALIX numerous times in quantities between 5 and 100 pills. CALIX charged TALBOTT \$15 per pill.

63. CALIX has been paranoid about being caught by law enforcement for several years but still continues to sell pills for profit. TALBOTT stated that CALIX became very paranoid when one of her customers, who was also a patient of Doctor-1—died of an opioid overdose in approximately 2015.

64. TALBOTT did not know all of CALIX’s current drug customers, but D.S., S.B., and A.J. continue to purchase oxycodone pills from CALIX. CALIX also provides monthly rent money and pills to her brother, J.S. to keep him from reporting her to law enforcement. She recently moved J.S. to West Virginia.

65. TALBOTT accompanied CALIX to the bank several times over several years to deposit the cash proceeds from drug transactions. SOVEREIGN also accompanied them on occasion. TALBOTT recalled that CALIX made the deposits at the Wells Fargo Bank in Front Royal near the Panda Express in the Target Shopping Center.

66. In September 2020, TALBOTT and CALIX had a falling out because TALBOTT did not want to continue giving CALIX her oxycodone 30 mg pills each month. TALBOTT knew that CALIX had patients cut off from Doctor-1 if they did not kick back pills to her.

Information from Pharmacist-1

67. Pharmacist-1, the owner of Bailey's Pharmacy in Falls Church, Virginia, was interviewed by law enforcement approximately four times between November 2019 and May 2021. One of the interviews, in January 2020, was conducted in conjunction with a Fairfax County Police Department (FCPD) investigation into a robbery that occurred at Bailey's Pharmacy. Pharmacist-1 was interviewed again in May 2021 in conjunction with a separate federal investigation. Pharmacist-1 closed Bailey's Pharmacy in or around mid-2021.

68. In sum and substance, the information provided by Pharmacist-1 from his interviews in 2019 is related below.

69. Pharmacist-1 was the original owner of Bailey's Pharmacy and opened the pharmacy in January 2012. Most of Pharmacist-1's customers came from only two physicians, Doctor-1, who is CALIX's employer; and Doctor-2, who is not relevant to this case.

70. Pharmacist-1 identified CALIX as an employee of Doctor-1. Pharmacist-1 knew this because both Doctor-1 and CALIX herself have identified CALIX as such. Pharmacist-1 has spoken to CALIX on the phone many times when calling Doctor-1's residence to verify prescriptions. CALIX filled multiple prescriptions at Bailey's Pharmacy for persons other than herself that were written by Doctor-1.

71. Pharmacist-1 provided internal video surveillance of his pharmacy for several days in 2019, including November 4, November 11, November 15, December 2, and December 28. He also provided footage from January 6 and 25, 2020. I requested these particular days to compare with PMP records, to determine the identity of persons who filled prescriptions issued to CALIX, SOVEREIGN, TALBOTT, H.H., M.T., C.T., H.M., J.B., and T.B. Pharmacist-1 would have observed the fact that CALIX and SOVEREIGN were in all of the requested video footage, despite the fact that I never identified them or Doctor-1 to Pharmacist-1 as subjects of the investigation. From the time I interviewed Pharmacist-1 on January 27, 2020, and requested the video footage, PMP data shows that he did not fill any more of Doctor-1's prescriptions for narcotics. On February 5, 2020, Pharmacist-1 filled one prescription for 30 alprazolam (Xanax) 2-mg pills written by Doctor-1 for Pharmacist-1. The prescription was dated September 5, 2019.

Physical and Video Surveillance

72. As noted above, law enforcement analyzed PMP data associated with Doctor-1, CALIX, SOVEREIGN, and others. The video footage obtained from Bailey's Pharmacy, as well as FBI video surveillance footage of persons entering and exiting the Residence where she practices medicine, have been compared and correlated to PMP reports for a period of several months beginning in and around April 2019. These comparisons show that approximately every month since April 2019, CALIX and SOVEREIGN acquired prescriptions for oxycodone and methadone from Doctor-1 at the Residence and filled them at Bailey's Pharmacy. These prescriptions were written for CALIX and SOVEREIGN, but also for individuals not seen at the

Residence on the days the prescriptions were written by Doctor-1. Such individuals include H.H., TALBOTT, M.T., C.T., and H.M.

73. For example, the footage from Bailey's Pharmacy for November 4, 2019, showed that on that day, CALIX, SOVEREIGN, and a minor child entered the pharmacy at approximately 5:53 p.m. CALIX handed Pharmacist-1 what appeared to be multiple prescriptions; SOVEREIGN also appeared to be holding multiple prescriptions, which she handed to Pharmacist-1. The footage shows Pharmacist-1 counting pills and filling bottles, which he eventually gave to CALIX and SOVEREIGN. At approximately 6:21 p.m., CALIX, SOVEREIGN, and the child departed.

74. According to PMP data, the following prescriptions written by Doctor-1 were filled at Bailey's Pharmacy on November 4, 2019:

- a. C.T. – 200 oxycodone 30-mg pills;
- b. M.T. – 180 oxycodone 30-mg pills;
- c. TALBOTT – 180 oxycodone 30-mg pills and 180 oxycodone 15-mg pills;
- d. H.H. – 90 methadone 10-mg pills;
- e. SOVEREIGN – 180 oxycodone 30-mg pills, 180 oxycodone 15-mg pills, and 60 methadone 10-mg pills; and
- f. CALIX – 200 oxycodone 30-mg pills.

75. The footage from Bailey's Pharmacy for November 11, 2019, shows that at approximately 6:00 p.m., SOVEREIGN arrived at the pharmacy. At approximately 6:08 p.m., SOVEREIGN was at the pharmacy counter, and she handed Pharmacist-1 what appeared to be

prescriptions. At approximately 6:28 p.m., Pharmacist-1 arrived at the cash register with two pharmacy bags and began ringing up the purchase. SOVEREIGN removed a wad of cash from her pocket and counted out between 17 and 20 bills. She then handed the bills to Pharmacist-1, who counted them and placed them in the \$20 bill section of the cash register tray. At approximately 6:31 p.m., SOVEREIGN left the pharmacy.

76. According to PMP records, the following prescriptions written by Doctor-1 were filled at Bailey's Pharmacy on November 11, 2019:

- a. J.B. – 180 oxycodone 30-mg pills and 180 oxycodone 15-mg pills;
- b. T.B. – 180 oxycodone 30-mg pills and 180 oxycodone 15-mg pills; and
- c. H.H. – 200 oxycodone 30-mg pills.

77. The footage for November 15, 2019, showed that on that day, CALIX, SOVEREIGN, and a minor child entered the pharmacy at approximately 3:54 p.m. CALIX and SOVEREIGN walked to the pharmacy counter and handed what appeared to be prescriptions to Pharmacist-1. CALIX exited the pharmacy briefly, and then returned with more prescriptions that she handed to Pharmacist-1, who proceeded to fill the prescriptions. A female cashier rang up the order, but when CALIX handed her cash, Pharmacist-1 walked over and opened the cash register so the cashier could put the cash in the drawer. At approximately 4:38 p.m., SOVEREIGN, CALIX, and the child exited the pharmacy.

According to PMP records, the following prescriptions written by Doctor-1 were filled at Bailey's Pharmacy on November 15, 2019:

- a. H.M. – 180 oxycodone 30-mg pills;

- b. CALIX – 160 oxycodone 30-mg; and
- c. C.T. – 160 oxycodone 30-mg pills.

78. On or December 2, 2019, FBI agents conducted surveillance in the vicinity of the Residence (in Arlington) and Bailey's Pharmacy (in Falls Church). At approximately 2:00 p.m., a white Jeep bearing Virginia tag VJP-3174 ("the Jeep") was observed adjacent to the Residence. DMV records showed that the Jeep is registered to CALIX. At approximately 2:15 p.m., CALIX, SOVEREIGN, and a small child exited the Residence and got into the Jeep, with CALIX in the driver's seat. The Jeep departed the Residence and drove to Bailey's Pharmacy.

79. The footage from Bailey's on December 2 shows the Jeep entering the parking lot at approximately 2:35 p.m. SOVEREIGN and CALIX exited the vehicle and scanned the parking lot for several minutes. At approximately 2:41 p.m., the two women and the child entered Bailey's and went to the pharmacy counter, where they handed Pharmacist-1 several prescriptions. At approximately 2:43 p.m., CALIX, SOVEREIGN, and the child exited the pharmacy and got back in the Jeep.

80. Thereafter, FBI agents observed the Jeep depart the parking lot onto Columbia Pike. Under FBI surveillance, the Jeep made a series of unusual and unnecessary U-turns, which I believe are indicative of attempts to evade detection.

81. At approximately 4:25 p.m., the Jeep returned to the parking lot adjacent to Bailey's Pharmacy and parked; SOVEREIGN was the only occupant of the Jeep. SOVEREIGN exited the Jeep and entered Bailey's Pharmacy. The footage from the pharmacy shows that at approximately 4:35 p.m., SOVEREIGN exited the pharmacy and then re-entered about five

minutes later. Pharmacist-1 brought to the counter approximately five pharmacy bags, which he placed into one plastic shopping bag. SOVEREIGN counted out cash and handed it to Pharmacist-1, who rang up the sale. Pharmacist-1 placed the cash in the register, and SOVEREIGN departed with the bag of prescriptions.

82. FBI then observed SOVEREIGN exit the pharmacy carrying a large plastic shopping bag containing several other paper prescription bags within it. SOVEREIGN entered the Jeep and departed the parking lot. At approximately 4:55 p.m., SOVEREIGN picked up CALIX and the child from a restaurant in Bailey's Crossroads. They departed the parking lot and headed north on Leesburg Pike toward Interstate 66 under FBI surveillance. At approximately 5:44 p.m., the Jeep made an erratic move and crossed four lanes from the HOV lane to exit 60 and exited Interstate 66, which caused FBI to terminate the surveillance.

83. According to PMP records, the following prescriptions written by Doctor-1 were filled at Bailey's Pharmacy on December 2, 2019:

- a. C.T. – 200 oxycodone 30-mg pills;
- b. M.T. – 180 oxycodone 30-mg pills;
- c. TALBOTT – 180 oxycodone 30-mg pills and 180 oxycodone 15-mg pills;
- d. H.H. – 200 oxycodone 30-mg pills and 90 methadone 10-mg pills; and
- e. SOVEREIGN – 180 oxycodone 30-mg pills, 180 oxycodone 15-mg pills, and 60 methadone 10-mg pills.

All of these pills total 940 oxycodone 30-mg, 360 oxycodone 15-mg, and 150 methadone 10-mg. Based on my training and experience, I know that the street value of these pills is approximately \$35,100.

84. Moreover, video surveillance of the Residence on December 2, 2019, shows that neither M.T., nor C.T., nor TALBOTT, nor H.H. were present at the Residence to be treated by Doctor-1 that day. In fact, video footage of the Residence shows that M.T., C.T., and H.M. have never been at the Residence on a day that Doctor-1 was seen there. H.H. and TALBOTT were rarely seen at the Residence on a day that Doctor-1 was seen there.

85. This pattern continued on December 28, January 6, and January 25, 2020. CALIX and SOVEREIGN, or just SOVEREIGN, arrived at Bailey's Pharmacy, hand several prescriptions to Pharmacist-1 to fill, and pay in cash.

86. According to PMP records, the following prescriptions written by Doctor-1 were filled at Bailey's Pharmacy on December 28, 2019:

- a. C.T. – 200 oxycodone 30-mg pills;
- b. M.T. – 180 oxycodone 30-mg pills;
- c. TALBOTT – 180 oxycodone 30-mg pills and 180 oxycodone 15-mg pills;
- d. H.H. – 200 oxycodone 30-mg pills and 90 methadone 10-mg pills; and
- e. SOVEREIGN – 180 oxycodone 30-mg pills, 180 oxycodone 15-mg pills, and 60 methadone 10-mg pills.

87. According to PMP records, the following prescriptions written by Doctor-1 were filled at Bailey's Pharmacy on January 6, 2020:

- a. J.B. – 180 oxycodone 30-mg pills and 180 oxycodone 15-mg pills;
- b. T.B. – 180 oxycodone 30-mg pills and 180 oxycodone 15-mg pills; and
- c. CALIX – 200 oxycodone 30-mg pills.

88. According to PMP records, the following prescriptions written by Doctor-1 were filled at Bailey's Pharmacy on January 25, 2020:

- a. M.T. – 180 oxycodone 30-mg pills;
- b. TALBOTT – 180 oxycodone 30-mg pills and 180 oxycodone 15-mg pills;
- c. H.H. – 90 diazepam 10-mg pills; and
- d. SOVEREIGN – 180 oxycodone 30-mg pills, 180 oxycodone 15-mg pills, and 90 diazepam 10-mg pills.

Controlled Purchases from Kendall SOVEREIGN

89. In and around April 2021, law enforcement developed a confidential source (CS-10), who was able to purchase oxycodone pills directly from SOVEREIGN. At the time, CS-10 was seeking consideration on local charges of brandishing a firearm and misdemeanor drug possession.

90. CS-10 has known SOVEREIGN for approximately 10 years and knows CALIX as “Nikki” or “Nicole.” CS-10 is also familiar with the fact that CALIX is employed by Doctor-1 and the means by which CALIX facilitates the distribution of oxycodone pills prescribed to her family members.

91. CS-10 purchased oxycodone 30-mg pills on a regular basis from SOVEREIGN for approximately four years. Typically, CS-10 purchased approximately 10 oxycodone 30-mg

pills approximately twice per week, every week for the past four years. CS-10 occasionally purchased as many as 40 oxycodone 30-mg pills. CS-10 usually paid \$25 per pill. CS-10 also purchased methadone 10-mg pills and oxycodone 15-mg pills from SOVEREIGN. Most of the transactions occurred at the Property, where SOVEREIGN, CALIX, H.H., M.T., and C.T. reside. Some of the transactions occurred in the vicinity of the Walmart and the Starbucks in Front Royal.

92. Based on statements that SOVEREIGN made to CS-10, and different drug company markings on the pills, CS-10 understood that the pills CS-10 purchased from SOVEREIGN came from the prescriptions of each of the residents of the Property at different times, including C.T. and M.T. (SOVEREIGN's parents and CALIX's grandparents). On multiple occasions, SOVEREIGN told CS-10 that the profits from the sale of the pills were used to pay the mortgage on the Property.

93. In addition to purchasing oxycodone pills from SOVEREIGN, CS-10 purchased between 10 and 20 oxycodone 30-mg pills directly from CALIX at least 12 different times. Most of the transactions occurred between mid-2018 and 2019 inside a mobile home in Winchester, Virginia, where CALIX and H.H. were staying periodically at the time. CS-10 paid CALIX approximately \$25 per pill. CS-10 stopped purchasing oxycodone pills directly from CALIX because H.H. did not like CALIX being around other men.

94. SOVEREIGN and CALIX use coded language to refer to the drugs they sell. CS-10 reported that SOVEREIGN and CALIX used the terms "tickets," "blueberries," and

“muffins” to refer to oxycodone 30-mg pills. They used the term “donuts” to refer to methadone 10-mg pills they sold.

A. Controlled Buy on April 29, 2021

95. On or about April 29, 2021, at the direction of the FBI, CS-10 met with SOVEREIGN at the Property in Front Royal to purchase oxycodone pills. The meeting was surreptitiously audio recorded by the FBI, as well as monitored by a live transmitter.

96. CS-10 made arrangements to meet with SOVEREIGN at the Property in the early afternoon, but SOVEREIGN said she had to wait on CALIX to provide her with the pills before she could sell them to CS-10.

97. At approximately 4:57 p.m., under FBI surveillance, CS-10 arrived in the driveway of the Property and waited in his vehicle for SOVEREIGN to exit the main blue house on the Property. At approximately 5:04 p.m., SOVEREIGN exited the blue residence, walked over to CS-10’s vehicle and stated, “She only did ten. So it’s two fifty.” CS-10 provided SOVEREIGN with \$250 cash in exchange for eight (8) round white pills stamped “R/P” on one side and “30” on the other; and two (2) small blue pills stamped “M” on one side and “30” on the other. Both types of pills were identified as oxycodone 30-mg pills.

98. Following this exchange, CS-10 departed the driveway and returned to a pre-determined area under FBI surveillance. The pills were taken into law enforcement custody and submitted into evidence. They were shipped to the DEA Mid-Atlantic Laboratory for formal testing, and results have not yet been returned.

B. Controlled Buy on May 10, 2021

99. On or about May 10, 2021, at the direction of the FBI, CS-10 met with SOVEREIGN at a parking lot in the vicinity of the Starbucks in Riverton Commons in Front Royal to purchase oxycodone pills. The meeting was surreptitiously audio and video recorded by the FBI, as well as monitored by a live transmitter.

100. CS-10 made arrangements to meet with SOVEREIGN at the Property in the early afternoon, but SOVEREIGN told CS-10 that she needed to fill the prescription for the oxycodone pills she was selling CS-10 at a pharmacy in Manassas, Virginia, and she would not be back in Front Royal until around 5:00 p.m.

101. At approximately 5:51 p.m., under FBI surveillance, CS-10 arrived in the parking lot of the Starbucks at Riverton Commons and waited in his vehicle for SOVEREIGN. At approximately 5:55 p.m., SOVEREIGN arrived in a green Isuzu Trooper (Virginia license tag XZM 1774) and parked adjacent to CS-10's vehicle. Both vehicles re-positioned in a nearby parking lot before parking again. SOVEREIGN then exited her vehicle, walked over to the passenger side of CS-10's vehicle and opened the door. The following is an excerpt from their recorded conversation:

CS-10:	30?
SOVEREIGN:	No, 20.
CS-10:	20?
SOVEREIGN:	I'm glad you said that
CS-10:	You don't have 10 more?
SOVEREIGN:	Uh-uh. [No]

CS-10: Dang-it

SOVEREIGN: Not yet. Later after she does whatever.

Conversation continues

CS-10: Here's 5

SOVEREIGN: Yeah

CS-10: Um... and then I guess let me know when she's going to get rid of some more cause I'm only going to be up here... What's today? Tuesday or Monday? Monday. So... Tuesday, Wednesday, maybe go back Thursday night.

SOVEREIGN: Oh, it will be before then. It might be tonight yeah know.

CS-10: Alright. Ehh I gotta work tonight so.

SOVEREIGN: Okay. Well then tomorrow.

CS-10: Maybe tomorrow night or something?

SOVEREIGN: Yeah. Just message me or I'll message you and we'll hook up tomorrow so.

CS-10: Okay

SOVEREIGN: I think she just wants to make sure cause of [H.H.'s] cousin.

CS-10: Oh, cause he is taking a bunch?

SOVEREIGN: Yeah

CS-10: That sucks

SOVEREIGN: Yeah, it does cause...

CS-10: You got to drive em all the way to him?

SOVEREIGN: No. No. He comes here.

CS-10: Isn't he all the way in Maryland?

SOVEREIGN: He comes here.

CS-10: Oh, he comes to you?

SOVEREIGN: Yeah

CS-10: Oh, that's good.

SOVEREIGN: Yep

102. CS-10 provided SOVEREIGN with \$500 cash in exchange for (20) small round blue pills stamped “ALG 265”; the pills were identified as oxycodone 30-mg pills. Following this exchange, CS-10 departed the parking lot and returned to a pre-determined area under FBI surveillance. The pills were taken into law enforcement custody and submitted into evidence. They were shipped to DEA laboratory for formal testing and results have not yet been returned.

103. A check of Virginia DMV records verified that the green Isuzu that SOVEREIGN was driving (“the Isuzu”) is registered to M.T. at the Property. Virginia PMP records show that a prescription for 160 oxycodone 30-mg pills was filled in the name of C.T. at Prosperity Pharmacy in Manassas, Virginia (within the Eastern District of Virginia) on May 10, 2021. I was able to verify that Prosperity Pharmacy dispenses blue oxycodone 30-mg pills stamped “ALG 265.” Accordingly, I believe that the pills that SOVEREIGN sold to CS-10 on May 10, 2021, were sourced from C.T.’s prescription that was filled at Prosperity Pharmacy that day.

C. Controlled Buys on May 24 & 26, 2021

104. On or about May 18, 2021, SOVEREIGN contacted CS-10 and said that she would fill her father C.T.’s prescription for oxycodone 30-mg pills on Monday, May 24, and have some to sell to CS-10. SOVEREIGN also told CS-10 that CALIX gets blue oxycodone 30-mg pills on Wednesday, and that CALIX would have some to sell on Wednesday, May 26.

105. On or about May 24, 2021, the FBI established surveillance at Prosperity Pharmacy located at 8644 Sudley Road in Manassas, Virginia. At approximately 4:25 p.m., the Isuzu arrived in the parking lot. At approximately 4:30 p.m., SOVEREIGN walked into the front door of the pharmacy under FBI surveillance. As she entered the pick-up line, one of the agents

on surveillance overheard her on the phone say, "picking up the prescription." At approximately 4:32 p.m., SOVEREIGN stated to the pharmacist she was picking up a prescription for C.T. THOMAS. After waiting inside the pharmacy for a brief time, SOVEREIGN obtained a bag from the pharmacy counter, exited the pharmacy, re-entered the Isuzu and departed the parking lot under FBI surveillance.

106. Approximately two hours later, at the direction of the FBI, CS-10 met with SOVEREIGN in the vicinity of the Starbucks in Front Royal, Virginia, to purchase oxycodone pills. The meeting was surreptitiously audio recorded by the FBI, as well as monitored by a live transmitter.

107. CS-10 arrived in the parking lot in the vicinity of the Starbucks at Riverton Commons, where SOVEREIGN had directed him to meet, at approximately 6:44 p.m. Approximately five minutes later, SOVEREIGN arrived in the Isuzu and parked next to CS-10's vehicle. SOVEREIGN exited her vehicle and walked over to the passenger side of CS-10's vehicle. The following is an excerpt from their recorded conversation:

CS-10	That's \$500. There's some ones. Sorry.
SOVEREIGN:	Yeah hopefully this week. I called him today and he's doing the alignment.
CS-10:	That'll be cool. Um I get paid Thursday so...
SOVEREIGN:	Okay
CS-10:	Um did you say she's gettin' hers Thurs... Wednesday?
SOVEREIGN:	Wednesday or Thursday.
CS-10:	Okay. I was going to say if not will you save me some more tickets
SOVEREIGN:	Yeah
CS-10:	I want to get more today I just don't have the money.

SOVEREIGN: Yep. I'll do that. I'll tell her to put some up for you.

CS-10: Alright

SOVEREIGN: I know his cousin is the one you know that gets a 100.

CS-10: Oh

SOVEREIGN: He gets a 100 at a time.

CS-10: That asshole. 100 at a time?

SOVEREIGN: Yeah

CS-10: What the fuck.

SOVEREIGN: Yeah. That's why she goes through 'em so quick you know.

CS-10: No wonder.

SOVEREIGN: And he doesn't ask for a discount.

CS-10: Oh, yeah?

SOVEREIGN: Yeah, 'cause he can still get rid of them for 40 bucks in Maryland.

CS-10: He gets rid of them for \$40 apiece in Maryland?

SOVEREIGN: Yep.

CS-10: Bullshit.

SOVEREIGN: That's our hot spot.

CS-10: 40 BUCKS!!

SOVEREIGN: 40 bucks. Isn't that crazy?

CS-10: That is crazy.

108. CS-10 provided SOVEREIGN with \$500 cash in exchange for 20 small round blue pills stamped "ALG 265"; the pills were identified as oxycodone 30-mg pills. SOVEREIGN told CS-10 that she would tell CALIX to hold back 40 oxycodone 30-mg pills from her prescription for CS-10 to purchase on Wednesday, May 26. Following this exchange, CS-10 departed the parking lot and returned to a pre-determined area under FBI surveillance.

The pills were taken into law enforcement custody and submitted into evidence. They were shipped to DEA laboratory for formal testing and results have not yet been returned.

109. A review of Virginia PMP records confirms that a prescription for 165 oxycodone 30-mg pills was filled in the name of C.T. (SOVEREIGN's father and CALIX's grandfather) at Prosperity Pharmacy in Manassas, Virginia, on May 24, 2021. I verified that Prosperity Pharmacy dispenses blue oxycodone 30-mg pills stamped with "ALG 265."

110. On or about May 26, 2021, the FBI established surveillance at Mayson's Pharmacy, which is located at 4199 Winchester Road in Marshall, Virginia, which is within the Eastern District of Virginia. At approximately 4:55 p.m., the Isuzu arrived in the parking lot. SOVEREIGN exited the vehicle entered the pharmacy under FBI surveillance. At approximately 5:00 p.m., SOVEREIGN exited the pharmacy carrying a white pharmacy bag, re-entered the Isuzu and departed the parking lot.

111. Approximately one hour later, at the direction of the FBI, CS-10 met with SOVEREIGN at the PROPERTY in Front Royal, Virginia, to purchase oxycodone pills. The meeting was surreptitiously audio recorded by the FBI, as well as monitored by a live transmitter. At approximately 6:17 p.m., CS-10 arrived at the driveway of the PROPERTY. At approximately 6:25p.m., a small child and SOVEREIGN exited the main blue house and approached CS-10's vehicle. The following is an excerpt of the conversation that was recorded:

SOVEREIGN: I couldn't find my, my phone.
CS-10: Ah no blues?
SOVEREIGN: Yeah, yep. No blues.
CS-10: Damn

SOVEREIGN: ... haven't gone and gotten hers so... I don't know when she could be getting em.

CS-10: Oh really? (*under breath* she sucks) Uh... here I owe three back cause I only have 925 for some reason so here.

112. CS-10 provided SOVEREIGN with \$925 cash in exchange for 37 small round white pills stamped "R/P 30"; the pills were identified as oxycodone 30-mg pills. They were provided to CS-10 on a paper plate. Following this exchange, CS-10 departed the driveway of the Property and returned to a pre-determined area under FBI surveillance. The pills were taken into law enforcement custody and submitted into evidence. They were shipped to DEA laboratory for formal testing, and results have not yet been returned.

113. Virginia PMP records confirmed that a prescription for 165 oxycodone 30-mg pills was filled in CALIX's name at Mayson's Pharmacy in Marshall, Virginia, on May 26, 2021.

D. Controlled Buy on June 29, 2021

114. On or about June 29, 2021, at the direction of the FBI, CS-10 met with SOVEREIGN in the vicinity of the Starbucks in Front Royal, Virginia, to purchase oxycodone pills. The meeting was surreptitiously audio and video recorded by the FBI, as well as monitored by a live transmitter. At approximately 5:20 p.m., CS-10 arrived at the parking lot of the Starbucks and parked adjacent to the Jeep, which was already there. At approximately 5:24 p.m., SOVEREIGN exited the Jeep and approached CS-10's vehicle, opened the door and leaned into the vehicle. The following is an excerpt of the conversation that was recorded:

CS-10: Uh, I may be around for a couple more days. Just depends on what my schedule is like in the morning. When's... when's Nicki [CALIX] gettin' more of the blues?

SOVEREIGN: Uh... it will probably be Monday. This will be Dad's [C.T.'s].

CS-10: Dad's on Monday?

SOVEREIGN: Yeah.

CS-10: Alright.

SOVEREIGN: Yeah, so...

CS-10: Alright

SOVEREIGN: She's [Doctor-1] been cutting us all back slowly.

CS-10: Really?

SOVEREIGN: And she's talking about putting us all on suboxone and that's just not gonna' happen. I'd rather stay on um... if I'm gonna do full of something its not gonna' be suboxone. It's gonna' be methadone so.

CS-10: Really?

SOVEREIGN: Cause, I can get rid of those a lot quicker.

CS-10: Ah, yeah.

SOVEREIGN: Truthfully...

CS-10: Right, makes sense.

SOVEREIGN: That's not gonna' happen ... hopefully at least another year or so. She's [Doctor-1] just tryna get people weened off of being so high right now.

CS-10: I gotcha.

SOVEREIGN: So...

CS-10: What's the next one after Monday? Cause, I probably won't be here Monday.

SOVEREIGN: Wednesday will be hers...

CS-10: Alright

SOVEREIGN: and then another two weeks.

CS-10: Alright, cause if I... if I leave tomorrow, I'll probably be back maybe next Wednesday.

SOVEREIGN: Okay.

CS-10: So, it'd be perfect. Tell Nicki to keep me at least 40 to 50 of hers.

SOVEREIGN: Alright, I'll tell her to save some.

CS-10: Yeah, cause, it'd be awesome. I do really like blues haha.

SOVEREIGN: Well Dad's gettin'... Dad's are blue too.

CS-10: Oh, they are? Yeah, I'm pretty... I'm pretty positive I won't be here Monday so.

SOVEREIGN: Okay.

CS-10: Alright... and then I guess I'll see you next week.

SOVEREIGN: Okay.

CS-10: So, there's no need to catch you tomorrow or anything.

SOVEREIGN: Yeah.

CS-10: So alright.

SOVEREIGN: I'll be around so.

CS-10: Alright. Don't forget to tell er at least 40 to 50.

SOVEREIGN: Okay I will.

115. CS-10 provided SOVEREIGN with \$1000 cash in exchange for 17 round white pills stamped "R/P" on one side and "30" on the other (identified as oxycodone 30-mg pills); 15 small round blue pills stamped "ALG" (identified as oxycodone 30-mg pills); five small round blue pills stamped "M" on one side and "30" on the other (identified as oxycodone 30-mg pills); and six white oblong pills stamped "R/P" on one side and "15" on the other side (identified as oxycodone 15-mg pills). The pills were all packaged together in a clear baggie. Following this exchange, CS-10 departed the parking lot and returned to a pre-determined area under FBI surveillance. The pills were taken into law enforcement custody and submitted into evidence.

116. Based on my training, experience, and knowledge of this case, I believe the pills recovered came from four separate prescriptions. The pills were shipped to DEA laboratory for formal testing and results have not yet been returned.

E. Controlled Buy on July 12, 2021

117. On or about July 12, 2021, at the direction of the FBI, CS-10 again met with SOVEREIGN at a parking lot in the vicinity of the Starbucks in Riverton Commons in Front Royal, Virginia to purchase oxycodone pills. The meeting was surreptitiously audio and video recorded by the FBI, as well as monitored by a live transmitter.

118. At approximately 7:12 p.m., SOVEREIGN arrived in the Jeep and parked adjacent to CS-10's vehicle, which was located in the parking lot of Riverton Commons. She exited the Jeep and entered CS-10's vehicle. The following is an excerpt from their recorded conversation:

CS-10: Nikki didn't save me any?
SOVEREIGN: No, she said there's no way that she could (*chuckling*).
CS-10: Right?
[passing money from CS-10 to SOVEREIGN]
SOVEREIGN: Yeah, so
CS-10: How come you always get these?
SOVEREIGN: I always, well, you always come on mom's [M.T.].
CS-10: Oh, your mom gets the same whites?
SOVEREIGN: Yeah, yeah
CS-10: You didn't find out where to get blues though?
SOVEREIGN: No, you gotta be lucky.
CS-10: Really

SOVEREIGN: Yeah, I mean I've thought about going to Nicole's [CALIX] because I—I know the woman now 'cause I always go get Nicole's

CS-10: Really?

SOVEREIGN: But they don't like when you have two or more people—

CS-10: In the same house.

SOVEREIGN: yeah, so

CS-10: Ah, I guess that makes 'em suspicious or something.

SOVEREIGN: and there's—yeah, yeah. So, and John already goes there too, so we're in um—

CS-10: Who's John?

SOVEREIGN: Just um, somebody that's been going there.

Conversation continues

SOVEREIGN: It's like, been a week.

CS-10: I'm—imma be in Richmond for a few days; when's—when's the next time blues are around?

SOVEREIGN: Um, blues will be around Monday.

CS-10: Nicole, or your dad [C.T.].

SOVEREIGN: Go get dad's on Monday, then mine are Tuesday, and then Nicole's are Wednesday, so

CS-10: Alright.

SOVEREIGN: But now off the jump, a hundred of 'em are gone Monday, so it's—it's

CS-10: (*high-pitched*) what?

SOVEREIGN: It's why you have to

CS-10: Who the fuck's getting all of them

SOVEREIGN: yeah, it's—it's his cousin.

CS-10: Fuck him!

SOVEREIGN: Forty, he gets like forty a pop—it's crazy, in Maryland.

CS-10: Forty a pop in Maryland?

SOVEREIGN: (*nodding*) yep

CS-10: That's crazy!

SOVEREIGN: I know, I know it is.

CS-10: Right?

SOVEREIGN: and that's why he makes the journey here, 'cause it's worth it.

CS-10: Right?

SOVEREIGN: You know, it's fifteen bucks he's making.

CS-10: Hey, you can't beat that. I mean, a hundred of 'em, that's what—fifteen hundred bucks?

SOVEREIGN: ... charging the same price, but

CS-10: Yeah, yeah yeah yeah! That's(?) what I'm saying, that's fucking crazy.

SOVEREIGN: yeah, man.

CS-10: Oh well. Alright, well I'll try to hit you up Monday or—

SOVEREIGN: okay

CS-10: Wednesday.

SOVEREIGN: and I'll just, you know, (*unintelligible*) Monday or Wednesday she'll have sixty-five after he leaves, I think.

CS-10: okay

SOVEREIGN: So, um, I'll tell her you will be Monday or Wednesday—

CS-10: yeah

SOVEREIGN: and I'll see if she should put some of them for you

CS-10: Right, you would think! Alright, I appreciate it.

SOVEREIGN: Alright, honey.

CS-10: Take care.

SOVEREIGN: Bye.

119. CS-10 provided SOVEREIGN with \$1000 cash in exchange for 40 round white pills stamped "R/P" on one side and "30" on the other; the pills were identified as oxycodone 30-mg pills. Following this exchange, CS-10 departed the parking lot and returned to a pre-

determined area under FBI surveillance. The pills were taken into law enforcement custody and submitted into evidence. They were shipped to DEA laboratory for formal testing and results have not yet been returned.

120. A check of Virginia PMP records confirmed that a prescription for 180 oxycodone 30-mg pills was filled in the name of M.T. (SOVEREIGN's mother) at Wegman's Pharmacy in Gainesville, Virginia—within the Eastern District of Virginia—on July 12, 2021. I verified that Wegman's Pharmacy dispenses oxycodone 30-mg pills that are white and stamped "R/P 30."

F. Controlled Buy on July 21, 2021

121. On or about July 21, 2021, at the direction of the FBI, CS-10 again met with SOVEREIGN at the Property in Front Royal, Virginia, to purchase oxycodone pills. The meeting was surreptitiously audio and video recorded by the FBI, as well as monitored by a live transmitter.

122. At approximately 6:22 p.m., CS-10 arrived at the driveway of the Property. At approximately 6:31 p.m., a small child, who appeared to be between four and six years old, approached CS-10's vehicle and said, "Mee Mee will be right here." The surreptitious video recorded H.H. in the distance adjacent to a tree house near the small bungalow on the Property where H.H., CALIX, and their children reportedly stayed.

123. Approximately 5–7 minutes later, the video recorded CALIX walking from the bungalow to meet SOVEREIGN where she was located adjacent to the main blue house. At approximately 6:39 p.m., SOVEREIGN approached CS-10's vehicle and provided CS-10 with

approximately 50 pills in exchange for \$1250. The following is an excerpt of the conversation that was recorded:

CS-10: Hi
SOVEREIGN: Sorry
CS-10: That's alright.
SOVEREIGN: I should've made her come get me. She's a goober... It's a mixture, so there's fifty.
CS-10: Alright
SOVEREIGN: I think there's thirty of the blues and then twenty of the, of the whites, so
CS-10: Yeah. I figured if you were gonna tell me she got changed to whites or something. I know you said a bunch of shit's been going on.

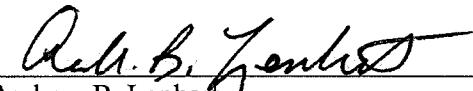
124. After the conversation concluded, CS-10 departed the driveway and returned to a pre-determined area under FBI surveillance. Agents recovered 51 pills from CS-10, including 29 small round blue pills stamped "ALG 265"; 20 round white pills stamped "R/P" on one side and "30" on the other; and two small elliptical pills stamped "R/P." The two elliptical pills were identified as oxycodone 15-mg pills. The rest of the pills were identified as oxycodone 30 mg pills. Based on my training and experience, the three different types of pills indicate they were recovered from three different prescriptions. The pills were taken into law enforcement custody and submitted into evidence. They were shipped to DEA laboratory for formal testing and results have not yet been returned.

CONCLUSION

125. Based on the information provided in this affidavit, probable cause exists to believe that from in and around 2013 through in and around January 2022, within the Eastern

District of Virginia, Candie Marie CALIX, a.k.a. "Nicole Thomas," "Nikki Calix," "Candie Kendall," and "Summer Angel"; Kendall SOVEREIGN, a.k.a. "Kendall Kilinski", "Elizabeth Sovereign"; and "Kendall Staples" and Jessica TALBOTT did knowingly, intentionally, and unlawfully combine, conspire, confederate, and agree with each other and with others, known and unknown, to unlawfully and intentionally distribute oxycodone, a Schedule II controlled substance, in violation of 21 U.S.C. §§ 841(a)(1) and 846. Wherefore, I respectfully ask that this Court issue the requested criminal complaint.

Respectfully submitted,



Andrew B. Lenhart
Special Agent
Federal Bureau of Investigation

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 via telephone this 5th day of April, 2022.

The Honorable Ivan D. Davis
United States Magistrate Judge